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August 23, 2019

VIA ECF and FACSIMILE (212) 805-4268

Hon. Gabriel W. Gorenstein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Starr Indemnity & Liability Company v. Brightstar Corp. et al.*
Index No.: 13 Civ. 8580 (GWG)
NHS File No.: 28000048 JAVN

Dear Judge Gorenstein:

We represent Plaintiff Starr Indemnity & Liability Company (“Starr”). We refer to Your Honor’s July 12, 2019 Opinion and Order on the parties’ motions for partial summary judgment (ECF Doc. 176) and Your Honor’s Order of the same date directing the parties to file certain pre-trial documents on or before September 6, 2019 (ECF Doc. 178).

The parties have been engaged in negotiations to resolve all outstanding issues without trial and are working towards submission for Your Honor’s consideration a proposed form of Final Judgment, in order to obtain immediate appellate review. Accordingly, pursuant to Rule 1(E) of Your Honor’s Individual Practices, we write on behalf of all parties to respectfully request a thirty (30) day extension of the September 6, 2019 deadline.

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This is the first request by the parties for an extension of this deadline. All parties consent to the requested extension.

Respectfully submitted,

NICOLETTI HORNIG & SWEENEY

By: *s/John A. V. Nicoletti*

John A.V. Nicoletti

JAVN/NN/mm

cc:

VIA ECF

All Counsel of Record